

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

THE UNITED STATES OF AMERICA,        )  
    )  
    )  
Plaintiff,                                 )  
    )  
    )  
v.    )      Civil Action No. 2:07-mc-3382-MHT  
    )  
    )  
WILEY THOMAS, JR.,                        )  
    )  
    )  
Defendant,                                 )  
    )  
    )  
and    )  
    )  
    )  
ING, LIFE INSURANCE AND                )  
ANNUITY COMPANY, et. al.,                )  
    )  
    )  
Garnishee,                                 )  
    )

**MOTION FOR STAY**

COME NOW the plaintiff, United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and respectfully requests that the instant matter be stayed for a period 30 days, and as grounds states as follows:

1.        Mr. Thomas, by and through his attorney Kevin Butler, Esq., and the United States have been involved in good faith negotiations aimed at resolving this matter with minimal, if any, Court involvement.
2.        Due to personal and professional time conflicts, the parties have yet to consummate an agreement, but are hopeful that same will be accomplished within 30 days.
3.        Counsel for Mr. Thomas has no objections to this request nor does the garnishee, ING.

WHEREFORE, premises considered, it is respectfully requested that this matter be stayed for a period of approximately 30 days.

Respectfully submitted this 17<sup>th</sup> day of July, 2008.

LEURA G. CANARY  
United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all other counsel of record.

/s/R. Randolph Neeley  
Assistant United States Attorney